vided that D and its agents should have free access to the meters and service for purposes of examination. X, an employee of D, entered P's house without rapping and without announcing his presence for the purpose of reading the meter, and seriously frightened P who was unaware of his entry. *Held,* D, was liable for injury to inmate through fright. *Mollinaux* v. *Union Electric Co.,* (Mo., 1921) 227 S. W. 265.

While the court conceded that the agents of D under the terms of the contract had a license, the liability of D was predicated on its abuse by D's agents, since ordinary prudence and a wholesome regard for the sanctity of the home requires that no entrance be made without announcing one's presence. In *Hitchcock* v. *Hudson Gas Co.,* 71 N. J. L. 565, D's agent having been refused admittance to remove a meter, subsequently returned and broke into P's home, and it was held that D was not liable since he acted under a license. But in *Reed* v. *New York Gas Co.,* 87 N. Y. S. 810, D was held liable for breaking into P's cellar in order to remove the meter on the ground that, as in the principal case, an abuse of a license renders one a trespasser *ab initio;* but the case may be distinguished from the New Jersey decision on the ground that it does not appear from the report that the agent had previously requested admittance. As to whether damages should be recoverable when resulting from fright, in an analagous case a trespassing meter reader was held to render his master liable for damages resulting from mental anguish. *Bouillion* v. *Laclede Gas Co.,* 148 Mo. App. 462. It would seem that where the cause of the mental suffering is the trespass on P's property, recovery should be allowed. *Watson* v. *Dilts,* 116 Ia. 249; 17 MICH. L. REV. 407; 34 HARV. L. REV. 280.

TRIAL—INSTRUCTION TO FIND THE DEFENDANT GUILTY IN A CRIMINAL CASE.—The defendant was indicted for selling liquor contrary to the local option law. The evidence for the state was uncontradicted and the judge instructed the jury that it was their duty to find the defendant guilty. *Held,* no error. *People* v. *Berridge* (1921), 212 Mich. 577.

It is generally held to be error to direct a verdict of guilty in a criminal case under any circumstances. *Lucas* v. *Commonwealth,* 118 Ky. 818; *Perkins* v. *State,* 50 Ala. 154. And there are but few recognized exceptions to this rule. In Michigan a long line of decisions has established the right of the court to instruct the jury to return a verdict of guilty in cases where no question of intent is involved. *People* v. *Neumann,* 85 Mich. 98 (selling liquor to a minor); *People* v. *Elmer,* 109 Mich. 493 (disorderly conduct). But the judge cannot discharge the jury and enter a verdict of guilty, nor can he coerce the jury into returning such a verdict. *People* v. *Warren,* 122 Mich. 504. Arkansas allows the direction of a verdict of guilty where the offense is a mere misdemeanor punishable by fine. *Stelle* v. *State,* 77 Ark. 441. As to the rule in the United States courts, see 19 MICH. L. REV. 325.

TRIAL—QUOTIENT VERDICT.—Amount that each juror thought the plaintiff should recover was set down and these then added and the average found. After a motion made by one juror to make it even money, leaving off $83 and